

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
FORT WORTH DIVISION

UNITED STATES OF AMERICA

v.

No. 4:15-CR-151-O

TONYA BLACKWOOD (03)

STATUS REPORT ON AGREED DEADLINES

TO THE HONORABLE REED O'CONNOR, U.S. DISTRICT JUDGE:

The United States Attorney for the Northern District of Texas, by and through the undersigned Assistant United States Attorney, files this Status Report and would show the Court the following:

The parties, including the probation officer, have agreed to the following deadlines:

1. The probation officer shall deliver the presentence report to the Court, and provide copies to the defendant and counsel for the parties, **no later than**

**October 26, 2015.**

2. Written objections to the presentence report or written notice of no objections, shall be filed and delivered to the Court, the probation officer, and counsel for the parties, **no later than November 2, 2015.**

3. A written response to the opposing party's objections to the presentence report shall be electronically filed with the clerk of Court and judge's copy delivered to chamber **no later than November 9, 2015.**

4. If written objections to the presentence report have been timely filed, the probation officer shall electronically file an addendum to the presentence report and deliver a judge's copy to chambers **no later than November 16, 2015**.

5. Each party shall deliver to the Court, the probation officer, and counsel for the parties **no later than November 16, 2015**, any other item the party wishes the Court to consider in connection with sentencing, including sentencing memorandum, character letters, and victim statements.

6. Any motion for a sentence above or below the advisory guideline range set out in the presentence report shall be filed with the district clerk, a copy of the motion shall be delivered to chambers, and a copy shall be delivered to the probation officer **no later than November 16, 2015**.

7. Any party served with a motion for upward departure or downward departure or sentencing memorandum or a request for sentencing variance shall electronically file a response with the district clerk and a judge's copy shall be delivered to chambers **no later than November 23, 2015**.

8. Written objections to the addendum to the presentence report, or written notice no objections, shall be filed and delivered to the Court, the probation officer, and counsel for the parties **no later than November 19, 2015**.

Respectfully Submitted,

JOHN R. PARKER  
UNITED STATES ATTORNEY

/s/ Shawn Smith

SHAWN SMITH  
Assistant United States Attorney  
State Bar of Texas No. 24033206  
801 Cherry Street, Unit #4  
Burnett Plaza, Suite 1700  
Fort Worth, TX 76102-6897  
Telephone: 817-252-5200  
Facsimile: 817-252-5455  
E-mail: [shawn.smith2@usdoj.gov](mailto:shawn.smith2@usdoj.gov)

**CERTIFICATE OF SERVICE**

I hereby certify that on October 2, 2015, I electronically filed the foregoing document with the clerk for the U.S. District Court, Northern District of Texas, using the electronic case filing system of the court. The electronic case filing system sent a "Notice of Electronic Filing" to the attorneys of record who have consented in writing to accept this Notice as service of this document by electronic means.

/s/ Shawn Smith

SHAWN SMITH  
Assistant United States Attorney